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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

DEC 20 1991

Federal Communications Commission  
Office of the Secretary

In the Matter of:

Administration of the North  
American Numbering Plan

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DA 91-1307

ORIGINAL  
FILE

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COMMENTS  
OF THE  
UNITED STATES TELEPHONE ASSOCIATION

The United States Telephone Association (USTA) is the principal national trade association of the exchange carrier industry. Its membership of more than 1000 exchange carriers provides nearly all of the local access lines in the United States. Its members also are relied upon by the public and by government to help assure that the North American Numbering Plan (NANP) operates in a constructive manner for carriers, users of the carriers' networks, and the overall public interest.

The Commission has issued a Public Notice with respect to a Petition filed by the National Association of Regulatory Utility Commissioners (NARUC).<sup>1</sup> USTA respectfully submits these comments on the Petition.

I. BACKGROUND.

NARUC has asked that the Commission commence an Inquiry concerning aspects of the NANP. NARUC identifies a number of

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<sup>1</sup> Public Notice, National Association of Regulatory Utility Commissioners Seeks Notice of Inquiry Addressing Administration of the North American Numbering Plan, DA 91-1307, 6 FCC Rcd 6070 (1991).

issues in its Petition that it suggests merit regulatory attention and the collection of information.<sup>2</sup>

The NARUC Petition contains a few misperceptions about the nature and operation of the NANP. NARUC would be in error if it believed that NANP administration before divestiture was spread among individual companies and states, without disciplined coordination within the industry. In addition, while there certainly would be costs for customers, in changing numbers due to area code splits and other modifications, the public costs of not taking action would, on balance, have larger and more widespread adverse impacts.

The exchange carrier industry shares a central concern that appears throughout the NARUC Petition - that customers should have available to them a cost-effective addressing convention that balances fundamental ease of use with an evolving capability to accommodate specialized uses and users. The continued viability of the NANP and its capability to accommodate the needs of carriers and users is and must remain a core concern for all involved in the industry. A numbering plan is without value if it cannot be understood and efficiently utilized by customers.

The current Administrator has had responsibility for various NANP-related duties since 1984. These duties involve both current handling of the NANP and future-oriented NANP planning.

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<sup>2</sup> Petition at 5-6.

The Administrator's handling of the NANP has been competent, efficient and careful.

The presence of a NANP Administrator, with its attendant expertise and open processes, is intended to assure that informed decisions on the handling of NANP numbering resources are made on the basis of objective input and criteria, and are communicated in a timely way to those who would be affected. To date, the Administrator has sought to administer the NANP in a constructive fashion, taking into account emerging issues and NANP network capabilities. In many respects, the wide range of numbering issues fielded by the Administrator, and its proven ability to work with unusual time constraints, underscores its continuing contribution to the public interest. Its performance merits continued strong support.

**II. FOR MOST ISSUES RAISED BY NARUC, AN INQUIRY IS NOT NECESSARY AT THIS TIME.**

USTA is not convinced that the commencement of an Inquiry is appropriate for all of the ten generalized concerns NARUC has identified in its Petition. Many of the concerns raised by NARUC are inappropriate for regulatory intervention at this time. Other concerns have been or are being addressed elsewhere, in other industry fora. These fora are open to regulators as well as others. At various times, representatives of the Commission and of state regulators have participated in or attended such fora. The Commission regularly receives materials that are made available through these fora on numbering, and it receives

minutes of those meetings.

NARUC reiterates some important concerns that have been raised in both industry and governmental arenas. Among them are cost allocation issues and carrier identification code (CIC) reclamation. These two issues can be resolved more favorably if the Commission provides clarity or direction, and confirms the Administrator's efforts. In the case of CIC reclamation, the Commission already has been asked for assistance.

Issues merit governmental consideration when regulatory action is needed to resolve them. That is not the case with most issues raised by NARUC. To the extent that the Commission concludes that any Notice of Inquiry should be issued, the Commission's Notice should specifically define each issue and identify each concern that it wishes commenters to address. The NANP is carefully structured. A broad look would be less likely to generate the precise facts needed to deal with NANP concerns.

**A. NANP-Related Items That Are Already Well Into Planning/Implementation Should Not Be Brought Into Any Proceeding.**

USTA does not support the inclusion in any Notice of Inquiry of matters that are already being implemented by carriers and that are well into planning cycles. These matters have had the benefit of widespread industry attention. Such matters include the deployment of interchangeable NPA codes and the specific procedures for CIC expansion. With these items, it is delay and

reorientation that would cause exactly the adverse impacts feared by NARUC.

For example, there are well-known anticipated CIC exhaust transition dates, and the risks and concerns have been well documented. The potential for earlier exhaust is understood. The Commission has been contacted for assistance in the NANP Administrator's efforts to conserve CIC codes. The Commission has not yet undertaken to assist in reclamation in any formal manner. Endorsement of reclamation efforts is appropriate; involvement beyond that assistance appears not yet merited.

Likewise, the implementation of interchangeable codes is already in progress in many places, has already had indisputable benefits, and has not had adverse impacts. No new public interest risk is likely to emerge at this point. If the Commission or others force any change in these areas, it is likely to lead to peripheral or new problems. This would include disruptions in anticipated equipment and software changes, and result in possible exhaust of available numbering resources.

**B. Technical Items Being Addressed in Industry Fora Should Be Handled There.**

USTA also does not support the inclusion in any Notice of Inquiry of technical issues that are more appropriate for consideration in other industry arenas. These include the T1 Committee of the Exchange Carrier Standards Association, the Industry (formerly Interexchange) Carrier Compatibility Forum,

and the periodic meetings sponsored directly by the NANP Administrator for the industry.

### III. CONCLUSION.

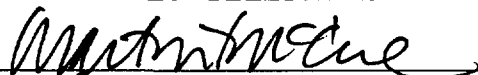
The central concern of USTA in addressing the Petition is that a single Inquiry encompassing all of the issues raised by NARUC will operate to delay existing programs that offer affirmative benefit, and will delay adjustments that are needed to prevent numbering dislocations. In the current time frame, with today's widespread and dynamic change, the public interest will not be served by the institution of new regulatory processes. This would be particularly the case with processes that inject new uncertainty, that are inexact in addressing issues, or that duplicate constructive efforts elsewhere.

USTA recognizes that the Commission has increased its informal monitoring of numbering matters by requesting more detail, and it is now more capable of responding to specific emergent concerns. That is an appropriate end result.

Respectfully submitted,

UNITED STATES TELEPHONE ASSOCIATION

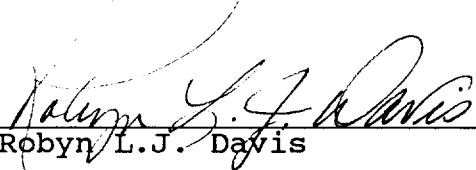
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December 20, 1991

**CERTIFICATE OF SERVICE**

I, Robyn L.J. Davis, do certify that on December 20, 1991 copies of the foregoing Comments of the United States Telephone Association were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.

  
Robyn L.J. Davis

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